

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

CHMURA ECONOMICS & ANALYTICS, LLC,)	Case No. 3:19-cv-813
)	Judge Robert E. Payne
)	
Plaintiff,)	
)	
v.)	
)	
RICHARD LOMBARDO,)	
)	
Defendant.)	

NOTICE OF FILING A MOTION TO SEAL

Defendant Richard Lombardo (“Lombardo”), by counsel, and pursuant to Local Rule 5(C) hereby provides this Notice of Filing a Motion to Seal. As set forth in the forthcoming Motion to File Exhibits under Seal and accompanying Memorandum of Law in Support, Lombardo will respectfully request that the Court permit Lombardo to file Exhibit 1 to the Declaration of Richard A. Lombardo In Support of the Opposition to Chmura’s Motion for Summary Judgment, Exhibit X of the Deposition of Christine Chmura, and Exhibit AA of Volume II of the Deposition of Leslie Peterson under seal. Parties and non-parties may submit memoranda of law in support of or in opposition to Lombardo’s Motion to File Exhibits Under Seal within seven (7) days.

If no objection is filed within seven (7) days, the Court may treat the Motion to File Exhibits under Seal as uncontested. Lombardo respectfully requests the Clerk to docket this matter in a manner that discloses its nature as a sealing motion.

Respectfully submitted,

/s/ Thomas J. Powell

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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing Notice has been served on this 29th day of May, 2020, via the Court's electronic filing system upon the following:

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